

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-06700025-2012**

Application Received: **February 28, 2012**

Plant Identification Number: **067-00025**

Permittee: **SMR Technologies, Inc.**

Mailing Address: **93 Nettie-Fenwick Road, Fenwick, WV 26202-9718**

Revised: N/A

Physical Location:	Fenwick, Nicholas County, West Virginia
UTM Coordinates:	536.20 km Easting • 4,230.90 km Northing • Zone 17
Directions:	The facility is located along WV Route 39 in Fenwick, WV.

Facility Description

The facility produces a variety of rubber fabric products. Fabric, zippers, cements, and solvents are received from off site. Zippers are attached to some pieces with a heated press. Some fabric is buffed before it is assembled and glued. Solvents are used to clean the fabric and thin adhesives. The pieces are then air or heat cured. The SIC codes for this facility are 3069 and 3624.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	15.18	1.13
Nitrogen Oxides (NO _x)	25.8	1.38
Particulate Matter (PM ₁₀)	4.75	0.62
Total Particulate Matter (TSP)	4.75	0.62
Sulfur Dioxide (SO ₂)	36.9	0.01
Volatile Organic Compounds (VOC)	42.27	17.93
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Toluene	16.7	5.30
Hexane	7.2	1.32
Miscellaneous HAPs	0.5	0.16
Formaldehyde	<0.5	0.0005

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 16.7 TPY of toluene. Due to this facility's potential to emit over 10 tons per year of a single HAP, SMR Technologies, Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Combustion of fuel in indirect heat exchangers
	45CSR6	Open burning prohibited.
	45CSR7	Particulate air pollution from manufacturing process operations
	45CSR10	Emissions of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction
	45CSR16	NSPS pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
40 C.F.R. Part 60, Subpart Dc	NSPS for small industrial-commercial-institutional steam generating units
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63, Subpart DDDDD	Boiler MACT
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only: 45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0415B	12/11/2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Equipment Changes

The following piece of equipment was added to the emission units table:

EP008—Paint Booth: This booth was installed in 2011. Reference to this booth was added to section 6.0 of this permit. This booth is covered under 45CSR7, which regulates particulate air pollution from manufacturing process operations. This unit is subject to the opacity and particulate emissions limits from this rule. To address the new paint booth, the following changes were made with this permit renewal:

- The opacity limits were previously included in condition 6.1.1. No changes to condition 6.1.1 were required. However, the citation was revised for condition 6.2.2, which specifies visible emission checks, to include 45CSR§30-5.1.c to address this paint booth.
- The citations were similarly updated for conditions 6.4.3. and 6.5.1; these conditions address monitoring records and deviation reporting.

40 C.F.R. 63, Subpart DDDDD (Boiler MACT) Requirements

On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21, 2014 [the new source compliance date was May 20, 2011). The Boilers [EP001 and EP 007] are gas-fired (fuel oil backup) with maximum design heat inputs of 16.8 and 24.5 MMBtu/hr. The 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial,

Commercial, and Institutional Boilers and Process Heaters,” placeholder language was included as Conditions 4.1.9 and 4.1.10.

On May 18, 2011 EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. However, on January 9, 2012 the US District Court for the District of Columbia declared unlawful EPA’s May 18, 2011 stay and delay of the major source Boiler MACT (40 CFR 63, Subpart DDDDD) and new portions of CISWI (40 CFR 60, Subparts CCCC and DDDD). However, EPA has plans to finalize its reconsidered versions of these rules by Spring 2012, and replace these newly reinstated rules, including re-setting of reporting and compliance timelines. In a January 18, 2012 letter to Senator Wyden of Oregon, EPA Administrator Jackson stated that using its enforcement discretion, EPA does not intend for the recent court decision to impact new or existing sources in the interim before the new rules are promulgated.

Performance Testing on Boiler 007

Condition 4.3.1 of R30-06700025-2007 required performance testing to determine the PM emission rate from emission source 007 to demonstrate initial compliance with the PM limit in 4.1.5. and the visible emission limit in 4.1.1. This testing was conducted on October 2, 2008. Particulate emissions averaged 0.23 lb/hr, and the highest 6-minute opacity average was 3.75%. These emissions were below the permit limits. Since the performance testing has already been performed, this condition was not included with this renewal.

Condition 4.5.1 of R30-06700025-2007 required a written report summarizing the results of testing required under permit condition 4.3.1. This report was submitted after the testing was performed. Therefore, this condition is no longer necessary and was not included with this renewal.

Condition 4.5.3 of R30-06700025-2007 required notification of the date of construction and actual startup of boiler 007. This notification has been received. Therefore, this condition is no longer necessary and was not included with this renewal.

Rewording of Permit Conditions

Based on EPA’s recent comments, the word “normal” was removed from the visible emissions monitoring requirements in conditions 5.2.2 and 6.2.2.

Greenhouse Gas Tailoring Rule: This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R. 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels. The fuel oil storage tank has a capacity of less than 75 m³.

40 C.F.R. 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. The 16.8 MMBtu/hr boiler (001) was constructed prior to June 9, 1989; therefore, it is not subject to the requirements of 40 C.F.R. 60 Subpart Dc. However, 40 C.F.R. 60 Subpart Dc is applicable to the 24.5 MMBtu/hr boiler (007).

40 C.F.R. 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. The parts assembled at this facility are not critical to a vehicles' structural integrity or flight performance per 40 C.F.R. §64.741(f).

40 C.F.R. 63, Subpart OOOO - National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles. The facility is not subject to this MACT because the fabric is not coated on a continuous web.

40 C.F.R. 64 - Compliance Assurance Monitoring (CAM). This facility is not subject to CAM. Since CAM applicability was not addressed in the 2007 fact sheet and a new paint booth has been installed, CAM is being addressed with this renewal. The boilers (001 and 007), assembly tables, heat cure presses, and autoclaves are not equipped with control devices; for CAM to apply, an emission unit must have a control device, as specified in 40 C.F.R. §64.2(a)(2). The buffing booths (002 and 005) and paint booths (006 and 008) have control devices installed, but their pre-control PTE for all regulated air pollutants is below the corresponding major source threshold; for CAM to apply, the PTE for an emission unit must be above the major source threshold, as specified in 40 C.F.R. §64.2(a)(3).

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	May 3, 2012
Ending Date:	June 4, 2012

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.